

# **EXHIBIT 41**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION

RICHARD CAMPBELL, )  
vs. Plaintiff, ) Case No.  
SHIRLEY TETER and SINCLAIR ) 1:17-cv-00129-MR-DLH  
COMMUNICATIONS, INC., )  
Defendants. )  
\_\_\_\_\_  
SHIRLEY TETER, )  
vs. Plaintiff, ) Case No.  
PROJECT VERITAS ACTION FUND, ) 1:17-cv-00256-MR-DLH  
et al., )  
Defendants. )  
\_\_\_\_\_

ATTORNEYS' EYES ONLY

Rule 30(b)(6) VIDEOTAPE DEPOSITION OF  
PROJECT VERITAS AND PROJECT VERITAS ACTION FUND  
By and Through its Designee

RUSSELL JOSEPH VERNEY

(Taken by Defendant/Counter Plaintiff Shirley Teter)

Winston-Salem, North Carolina

Tuesday, November 20th, 2018

Reported by: Judy F. Reins, RMR, CRR

1           Q. When was your conversation with Mr. Calli?

2           A. A few days ago.

3           Q. Topic 13 is monetary donations resulting  
4 from Video I, II, and III.

5                 Did you speak to anyone -- I think you  
6 testified when we came back from the break that you  
7 did speak with someone to prepare for this topic?

8           A. I did. We used an independent contractor to  
9 manage our online fundraising, our email solicitation  
10 fundraising, and I inquired of him what solicitations  
11 we had sent with respect to Mrs. Teter.

12          Q. What did you learn -- well, what's that  
13 individual's name?

14          A. Shane Cory, C-O-R-Y.

15          Q. What did you learn from Mr. Cory?

16          A. The only email that mentioned Ms. Teter was  
17 after what we had been referring to here as Video III,  
18 the video about the multiple lawsuits, and she was  
19 mentioned as part of that email solicitation that went  
20 out requesting donations to Project Veritas.

21          Q. What did you learn about the donations that  
22 were received from that request?

23          A. Total donations from that request was  
24 roughly \$8,000, and I believe it was from about 160  
25 individual donors.

1           **reaction. We were trying to educate. What**  
2           **people -- how people reacted to it was their**  
3           **business, but we were trying to educate.**

4 BY MR. SASSER:

5           Q. Do these comments reflect the education you  
6 were trying to create?

7           A. Well, it -- these comments reflect the  
8 opinions of the people who posted them and that's all.

9           Q. Do you feel like these people were educated  
10 by Video II?

11          A. I have no idea.

12          Q. If you would, please turn to page 13.

13          A. Okay.

14          Q. Can you read paragraph 52 aloud?

15          A. (Reading) Numerous viewers of defendants'  
16 Video II became persuaded that Mrs. Teter is a liar.  
17 She's MP USMC SRT. So she straight up lied.

18                 **Madea Simmons -- M-A-D-E-A, S-I-M-M-O-N-S --**  
19                 **Liar.**

20                 **The Chosen One: What a lying bitch.**

21                 **AnneBeck58 -- A-N-N-E, B-E-C-K, 58 -- I hate**  
22                 **what she did at this point. I question her entire**  
23                 **story. Was she hit by anyone? Would anyone hit a**  
24                 **woman of this age wearing an O2 mask or is this just a**  
25                 **sham? I don't know. I hardly think it would happen.**